

ATTACHMENT A

Accessible



“Notification of SBC/CLEC Collaborative Line Sharing Trial Meeting – Arkansas, Kansas, Missouri, Oklahoma, Texas”

Date: January 11, 2000

Number: **CLEC00-012**

Contact: Jeff Fields

This letter serves as your invitation to attend a meeting on January 25, 2000 in San Francisco to participate in discussions relating to a SBC/CLEC collaborative line sharing trial. It is anticipated that participants of this meeting will work together to develop terms and conditions for such a trial.

SBC will conduct a collaborative line sharing trial in each of the SWBT, Pacific Bell and Ameritech operating regions. Commencement of this trial is scheduled for February 2000.

Interested participants must have DSL rates, terms and conditions in their existing Interconnection Agreements or enter into an interim DSL agreement while the parties negotiate and/or arbitrate final DSL terms in a final Interconnection Agreement and have collocated equipment in the yet to be determined central offices which will be a part of the trial.

Specific details regarding time and location are forthcoming based on CLEC response to this inquiry. CLECs interested in participating in the trial will receive an agenda for review and input in advance of the meeting.

To confirm your participation in this meeting, please contact Jeff Fields on 214-464-1811 by Tuesday January 18, 2000.

ATTACHMENT B

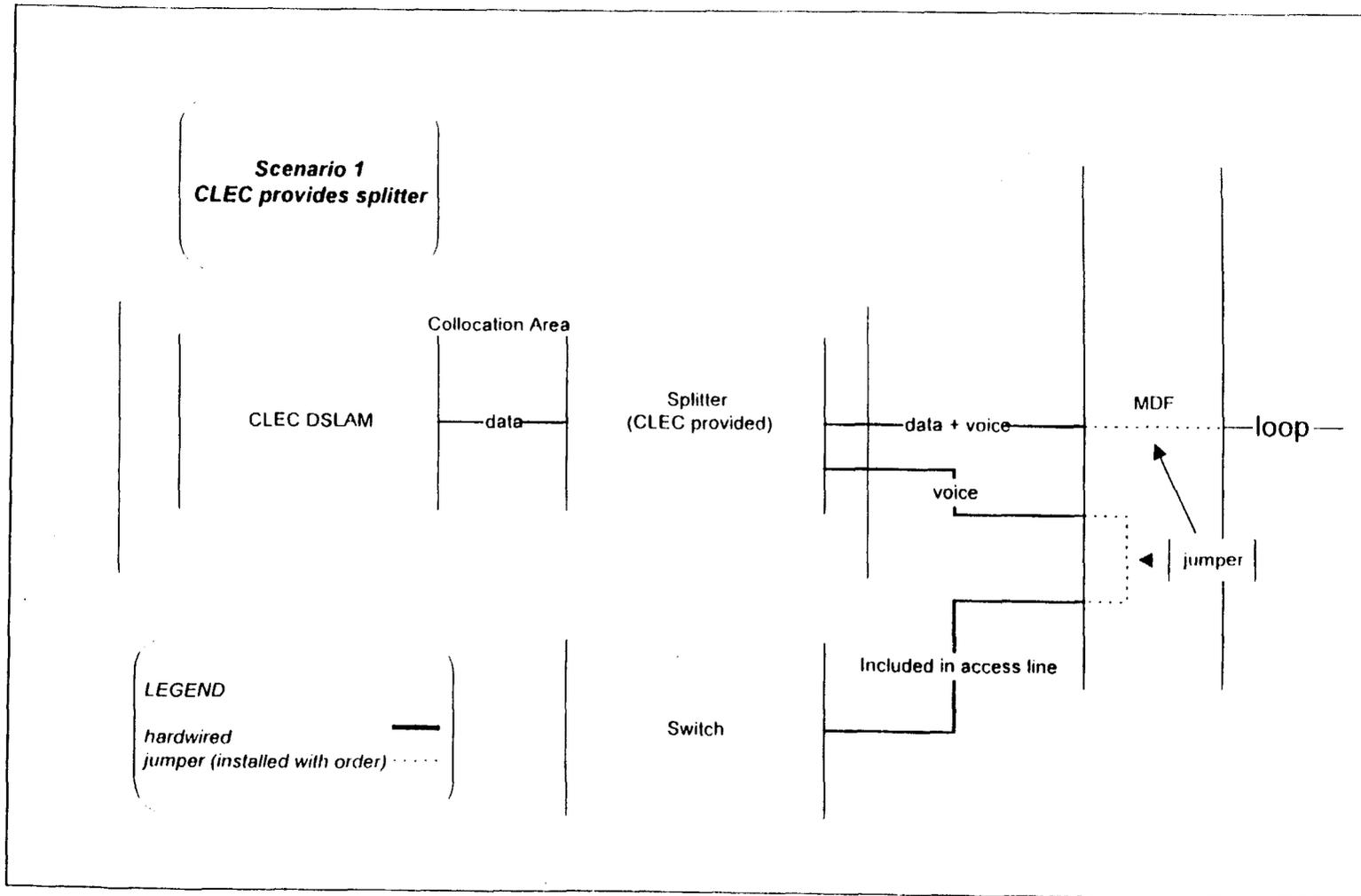


Figure 1

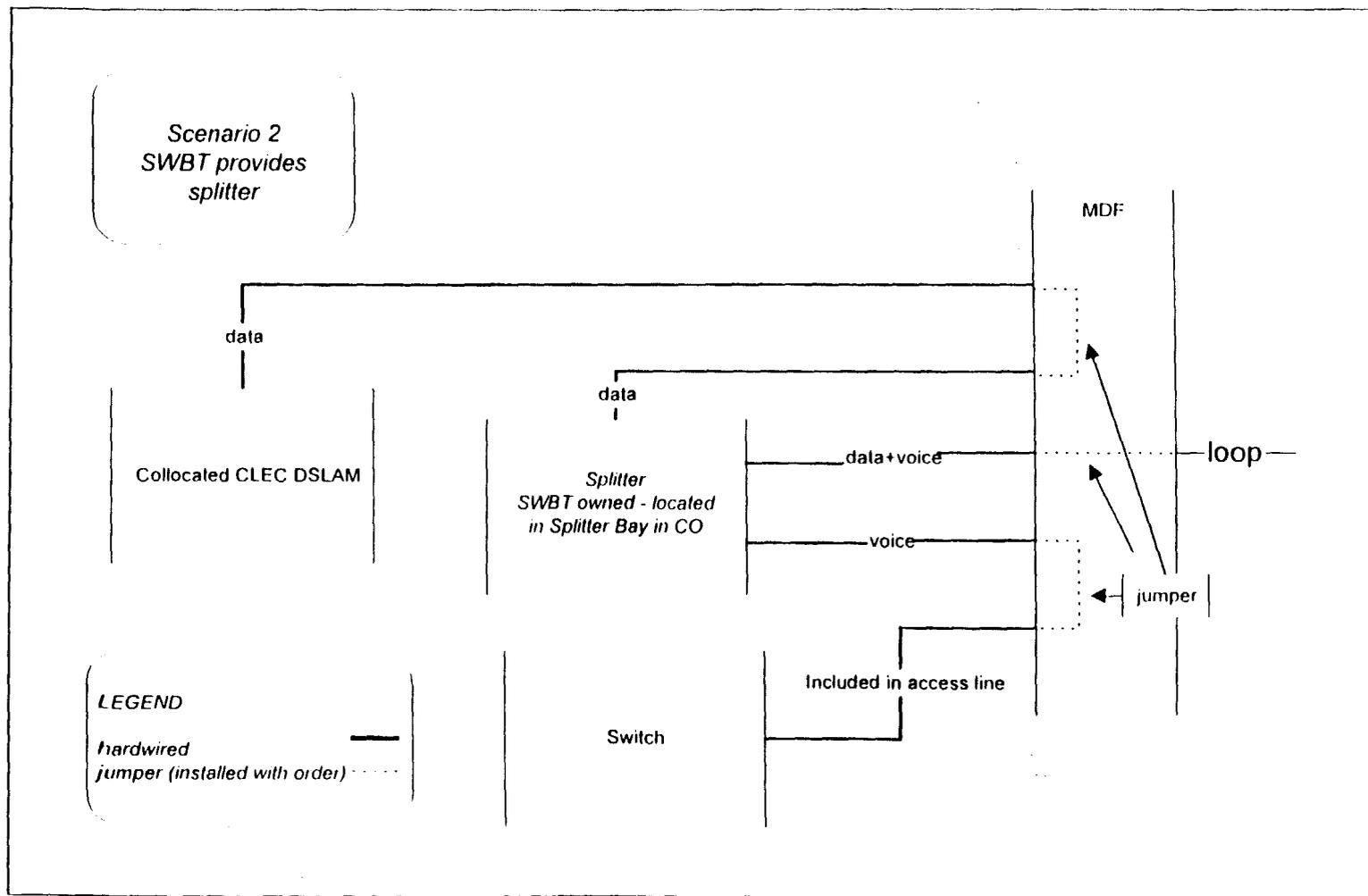


Figure 2

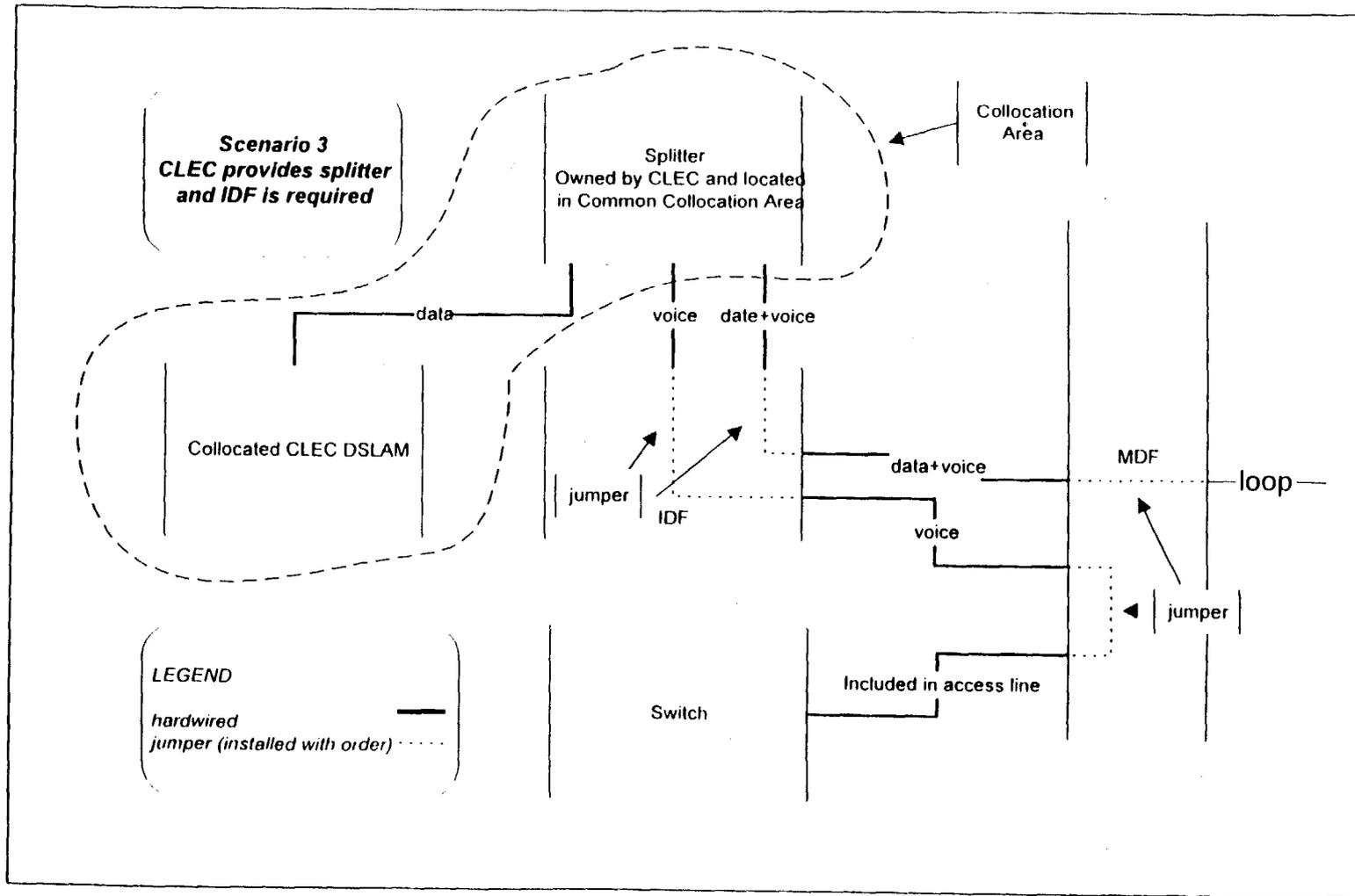


Figure 3

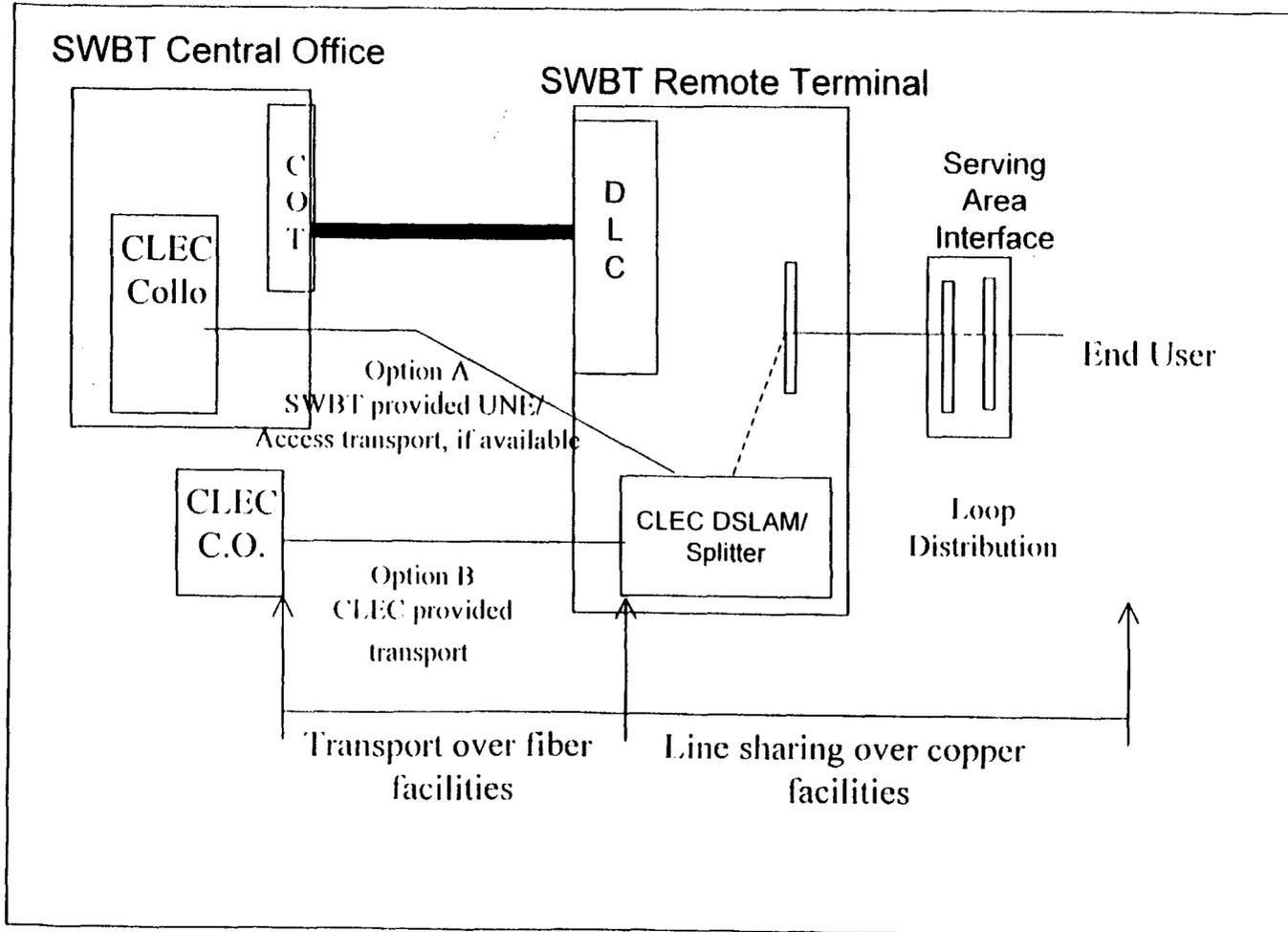


Figure 5

ATTACHMENT C

Accessible



**“SBC/Ameritech OSS Plan of Record for xDSL and Other Advanced Services –
Arkansas, Kansas, Missouri, Oklahoma and Texas”**

Date: December 7, 1999

Number: **CLEC99-183**

Contact: Southwestern Bell Account Manager

This Accessible Letter is to notify you of the completion of the OSS Plan of Record for Pre-Ordering and Ordering of xDSL and Other Advanced Services in compliance with the SBC/Ameritech Merger Conditions approved in the Memorandum of Understanding and Order, released on October 8, 1999 (Section III, Paragraph 15.c).

In compliance with Phase I of this condition, this notification is being sent to all CLECs who have current interconnection agreements with SBC/Ameritech in any of the following thirteen states: Arkansas, California, Connecticut, Illinois, Indiana, Kansas, Michigan, Missouri, Nevada, Ohio, Oklahoma, Texas and Wisconsin.

The attached OSS Plan of Record document will also be filed with the FCC no later than December 10th, 1999 in compliance with Phase I section (A).

We urge you to carefully review this Plan of Record. Should you have any questions or need clarification, please contact your Account Manager. Requests for enhancements to this plan must be requested in writing, no later than January 6, 2000. These requests should be sent to your Account Manager.

Attachments

OSS Plan of Record for Pre-Ordering and Ordering of xDSL and Other Advanced Services

I. OVERVIEW

A. Introduction

This Plan of Record has been developed in response to the Federal Communications Commission (FCC) requirements pertaining to the pre-ordering and ordering of Digital Subscriber Line (DSL) and other Advanced Services as set forth in the SBC Communications (SBC) Ameritech Merger Conditions approved in the Memorandum of Understanding and Order, released on October 8, 1999 (SBC/Ameritech Merger Conditions). This document is designed to provide a comprehensive analysis and plan focused on the development of enhancements to DataGate and Electronic Data Interchange (EDI) for Pre-Ordering and EDI for Ordering.

The development of this Plan of Record began with the initial analysis performed for the Operations Support Systems (OSS) Process Improvement Plan previously filed with the FCC. SBC has followed the approach described in the OSS Process Improvement Plan, which included hosting two separate Competitive Local Exchange Carrier (CLEC) DSL Business Needs Workshops in November of this year. Several CLEC recommendations have been incorporated into this Plan of Record.

Consistent with the SBC/Ameritech Merger Conditions, all references to CLEC(s) include SBC's data affiliates and retail organizations operating under joint marketing agreements on behalf of the data affiliates, when ordering the local competitive products included in the scope of this plan

B. Scope

This Plan of Record has been developed in accordance with the SBC/Ameritech Merger Conditions to provide pre-ordering and ordering of xDSL and other Advanced Services, as specified in paragraph 15c. An analysis of the Present Method of Operation (PMO) was completed for each of the four regions of SBC. A Future Method of Operation (FMO) was developed to enhance pre-ordering and ordering of xDSL.

Even though many planned enhancements are consistent with the UNE Remand Order, any additional requirements not identified in this Plan of Record will be included in SBC's implementation of the Order. Additionally, at the time of the creation of this document, the Line Sharing Order had not been published and therefore implications of that order are not included in this Plan of Record. Nonetheless, once the details of the line sharing order have been analyzed, SBC will incorporate the requirements of that order into the modifications it is planning for the pre-ordering and ordering of xDSL services.

In response to the SBC/Ameritech Merger Conditions, this process explicitly addresses the pre-ordering and ordering processes and enhancements pertaining to EDI and DataGate. However, consistent with the input provided through the CLEC DSL Workshops, other Advanced Services (i.e., Frame Relay and Cell Relay services) will continue to be ordered through the industry-standard Access Service Request (ASR) mechanized ordering process currently deployed throughout the SBC thirteen states.

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During the development of this plan, the data capabilities (i.e., connectivity) and hardware capabilities were determined to require no changes since these capabilities are not product specific. Since the SBC/Ameritech Merger Condition specifically calls for enhancements to the existing DataGate and EDI interfaces, existing data and hardware capabilities will continue to apply.

C. Process Methodology

As mentioned above, the process utilized to develop this Plan of Record was based on the SBC/Ameritech Pre-Merger OSS Process Improvement Plan. In responding to the Process Improvement Plan, first a detailed review of each regional PMO was undertaken including current business rules, processes and capabilities. Second, an analysis of the existing DataGate and EDI interface capabilities was completed as well as an inventory of relevant data elements. The process further identified the data sources for these elements and, where data sources existed, whether the data resided in a database or in manual records. Please refer to the Data Element matrix in Attachment A for detailed information. Next, CLEC business needs were solicited through xDSL CLEC Workshops hosted by SBC. Through streamlining processes and integrating data gathered through the xDSL CLEC Workshops, a common FMO was established. The information obtained through these processes is provided below in the PMO and FMO sections of this document. Also, a glossary of terms used in the document is included as Attachment B.

I. PRESENT METHODS OF OPERATION (PMO)

A. Overview

Digital Subscriber Line technology allows broadband services such as video, voice, and data to be transmitted over standard copper cable. DSL services have specific technology requirements that make some form of qualifying potential loops mandatory for successful deployment. Qualification and ordering processes indicate whether a loop is capable of supporting xDSL technology and offer CLECs an opportunity to either condition the loop or make alternate decisions about their technology deployment choice.

SBC's regions offer a wide variety of pre-ordering functionality available through various proprietary and industry standard interfaces and manual processes. All regions utilize some of the same data elements, though there are differences from region to region. Pre-ordering functions applicable to xDSL loops are listed below:

- Address Validation/Verification – allows a client to validate that an address is within the SBC serving area and provides location specific information
- NC – allows a client to validate a Network Channel (NC) code

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- NCI – allows a client to retrieve valid Network Channel Interface (NCI) and Secondary Network Channel Interface (SECNCI) codes to be used in the ordering process
- Pre-Qualification – determines generalized information about loop length and indicates availability of xDSL service at a specific address
- Loop Qualification – determines specific, detailed loop make-up information for a loop to a specific address and provides information necessary to determine the suitability of that loop for xDSL services

The pre-ordering functions listed above have similarities with some minor differences by region. Only the last two functions are unique to xDSL, therefore the PMOs that follow will focus on these functions. The ordering process for xDSL-capable loops is similar to the current ordering process for UNE loops, therefore the document will focus on the unique ordering steps of an xDSL loop.

A. PMO for Southwestern Bell Region (SWBT)

Pre-Qualification

Pre-qualification is a screening function to aid in determining the probability that a loop will be able to support the service the CLECs intend to offer. Pre-qualification is available to CLECs via DataGate or Verigate. The pre-qualification step is optional and there is no charge for this service.

Pre-qualification provides the 26 gauge equivalent designed loop length and a "Green", "Yellow" or "Red" status. This status is defined as follows:

- "Green" indicates the longest designed loop for the Distribution Area (DA) serving the specified address is less than or equal to 12,000 feet.
- "Yellow" indicates the designed loop for the DA serving the specified address is between 12,000 and 17,500 feet.
- "Red" indicates the designed loop for the DA serving the specified address is longer than 17,500 feet and/or that the DA is served exclusively by Digital Loop Carrier (DLC). It may also indicate that the specified address is in a wire center that neither SWBT nor any CLEC has specified for xDSL deployment.

Loop Qualification

Loop qualification is a manual process. The loop qualification request is faxed to the Local Service Center (LSC), the LSC service representative completes a loop qualification request form and forwards it to Outside Plant (OSP) Engineering. OSP Engineering performs the loop qualification and returns it to the LSC who forwards the results to the CLEC. This process can be performed prior to the submission of an order; if not, it is performed upon receipt of the Local Service Request (LSR). There is a charge for loop qualification regardless of when in the

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process this step is performed. The loop qualification process takes 3-5 business days from the time a correct loop qualification request is received by the LSC (from CLEC) to the time loop qualification is completed by OSP Engineering and returned to the CLEC. The loop qualification information returned to the CLEC includes:

- 26 gauge equivalent loop length
- Actual length of the loop by gauge
- Quantity of bridged taps, load coils and repeaters present on the loop
- Length of the feeder cable (F1) and the distribution cable (F2) respectively
- Existence of fiber in the loop
- Any disturbers currently present in the same and adjacent binder group
- An indication as to whether the loop currently qualifies for the CLEC specified Power Spectral Density (PSD), based on the industry standards or draft standards, whichever are currently published
- Tracking number (which must be referenced if an order is placed)

After receiving the loop qualification information, the CLEC will decide whether to place an xDSL loop order. The loop make-up information returned to the CLEC is considered valid for 30 calendar days.

Ordering

Ordering is initiated by submitting an LSR with the necessary information for an xDSL-capable loop. This includes a tracking number when loop qualification has been performed in advance. The CLEC can submit the LSR via fax, the Local Service Request Exchange (LEX) system or EDI.

When there is no tracking number on the request, the LSC will suspend processing until the loop qualification step is performed. The LSC will return a copy of the results to the CLEC.

When the loop meets the specifications and/or the conditions on the LSR, the service order is issued and the Firm Order Confirmation (FOC) is returned to the CLEC. Conversely, if the loop did not meet the specifications and/or conditions specified by the CLEC, the LSR will be rejected. The CLEC then has the option of resubmitting the LSR with revised specifications and/or conditions.

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C. PMO for Pacific Bell / Nevada Bell Region (PB/NB)

Pre-Qualification

Pre-qualification is a screening function to aid in determining the probability that a loop will be able to support the service the CLECs intend to offer. Pre-qualification is available to CLECs via DataGate, Verigate or manually. The pre-qualification step is optional and there is no charge for this service.

Pre-qualification provides RTZ indicators of 12, 17, 18, or blank, which equate to the following information:

- "RTZ 12" indicates the designed loop for the DA serving a specified address is between 0 and 12,000 feet. A "12" status indicates the loop will qualify for most types of xDSL.
- "RTZ 17" indicates the designed loop for the DA serving a specified address is between 12,001 and 17,500 feet.
 - "RTZ 18" indicates the designed loop for the DA serving a specified address is over 17,500 feet from the central office.
 - "Blank" indicates that the specific address is in a wire center that neither PB / NB nor any CLEC has specified for xDSL deployment yet.

For CLECs who do not utilize Verigate/DataGate for pre-ordering activities, the PB / NB region will provide the information via phone, fax or email at the CLEC's request.

Based on the type of xDSL loop specified in interconnection agreements, a pre-qualification result of RTZ 12 requires no further qualification of the loop. When the RTZ result is 17, 18 or blank, a full loop qualification should be performed as described below.

Loop Qualification

Loop qualification allows the CLEC to obtain detailed loop qualification/make-up information through manual requests via e-mail or fax. The charge for loop qualification service is based on individual contracts.

The loop qualification process in the PB / NB region is partially mechanized. After the CLEC submits the loop qualification request, the LSC utilizes an internal mechanized tool to obtain primary loop make-up information. If the mechanized tool fails to provide all the necessary elements, a manual engineering process is invoked to determine the full loop make-up. Loop qualification information, whether obtained manually or mechanically, provides the following:

- 26-gauge equivalent designed loop length
- Length of the loop by gauge

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- Length of bridged tap, presence of load coils and repeaters
- F1 and F2 information
- Existence of fiber
- Any associated disturber technologies
- Provisioning interval
- Transaction code (or Tracking number)

PB / NB's response to the CLEC with qualification information can range from 5 minutes to 72 hours. Because high demand for xDSL service is constantly impacting the network profile, the loop make-up information returned to the CLEC is valid for 30 calendar days.

After receiving the loop qualification information, the CLEC will decide whether to place an xDSL loop order.

Ordering

Pacific Bell and Nevada Bell currently offer two ordering options for a CLEC. A CLEC can order an xDSL-capable loop via an LSR or an Interconnection Service Request (ISR). LSRs can be submitted electronically (LEX or EDI) or manually (fax, mail). ISRs can be only be submitted electronically via CESAR.

Upon receipt of a valid LSR/ISR, with a loop qualification transaction code for an address that was qualified within 30 calendar days of submission, the request will not need to be qualified again. The request will be processed, a service order generated and the FOC returned to the CLEC.

Any xDSL loop request received without the presence of a transaction code, or with a transaction code more than 30 days old, will require loop qualification. The request will be loop qualified using whatever combination of RTZ indicators, mechanical and manual qualification necessary to determine if the address qualifies for the requested type of DSL loop.

If the address does not qualify for the specific type of DSL requested and is longer than 18,000 feet, PB / NB will contact the CLEC with a recommendation for an IDSL loop. It is then the CLEC's responsibility to decide if an order should/should not be placed for the original or recommended DSL technology.

Once PB / NB processes the service order, a FOC will be sent back to the CLEC. At this time, loop make-up information will be provided back to the CLEC. The standard interval for unconditioned loops is 7 business days, 10 business days for conditioned loops, and 15 business days for loops requiring repeaters. Design Layout Reports (DLRs) are currently provided only for loop types that require repeaters.

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D. PMO for Ameritech Region

Pre-Qualification

Ameritech currently does not provide pre-qualification of xDSL loops.

Loop Qualification

Loop qualification allows the CLEC to obtain detailed loop qualification/make-up information through manual requests via e-mail. This process is currently only available in Illinois and will be expanded to the other four states by January 6, 2000. The charge for loop qualification service is based on time spent on each request.

Loop qualification information provides the following:

- Length by gauge, by segment
- Location of cable plant (A=aerial. B=buried. U=underground)
- Capacitance – existence of interferers such as range extenders, MFTs, etc
- Location and approximate length of bridged taps
- Load Coils – including type, and location
- Number of points of loading
- Presence of DLC (Yes/No)
- Copper or Fiber fed DLC
- Loop make-up is described from the customer premises back to serving central office

Ameritech's response to the CLEC with qualification information can range from sixty minutes to five business days.

The CLEC can calculate 26-gauge equivalent loop length using a formula which Ameritech provides. After receiving the loop qualification information, the CLEC will decide whether to place an xDSL loop order.

Ordering

Ameritech currently offers two ordering options to a CLEC. A CLEC can order an xDSL-capable loop via a Local Service Request (LSR) or an Access Service Request (ASR). Both requests must be submitted electronically either via EDI or BDS-Telis (EXACT).

Once a valid order is received, a due date will be assigned to the order. If no dispatch is required, the standard interval per the CLEC's interconnection agreement will be assigned. If a dispatch is required, the loop order will be assigned an available due date per the network administration Force and Load system. All retail local exchange service orders as well as all unbundled loop

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orders requiring dispatch are assigned available due dates from this system on a first-come, first-served basis. The FOC with an expected due date is returned to the CLEC within an established interval.

If a loop exists that meets the technical specifications for the requested loop type (NC NCI code combination), Ameritech will provision the loop. If conditioning is required to make the loop meet the required technical specifications, the order will be sent to engineering for an estimate of the cost and timeframe required to make the loop meet the technical specifications for the type of loop ordered. Once developed, this information is then provided to the CLEC via fax on a "Loop Make Up (LMU) Response Notice". At this point in time, the order is "suspended" awaiting approval from the CLEC regarding payment of the associated costs and acceptance of the due date. If the CLEC has not acted on the notice within 5 days, the order is cancelled. If the CLEC indicates an acceptance of the costs and due date, provisioning will commence.

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E. PMO for Southern New England Telephone Region (SNET)

Pre-Qualification

SNET currently does not provide pre-qualification of xDSL-capable loops.

Loop Qualification

Loop qualification is a manual process. The loop qualification request is faxed to the Local Exchange Carrier Center (LECC), the LECC service representative completes a loop qualification request form and forwards it to Outside Plant (OSP) Engineering. OSP Engineering performs the loop qualification and returns it to the LECC who forwards the results to the CLEC. If this process is not performed prior to the submission of an LSR; it will be performed upon receipt of the LSR. There is a charge for loop qualification regardless of when in the process this step is performed. The loop qualification process takes 3-5 business days from the time a correct loop qualification request is received by the LECC to the time loop qualification is completed by OSP Engineering and returned to the CLEC. The loop qualification information returned to the CLEC includes:

- 26 gauge equivalent loop length
- Actual length of the loop by gauge
- Quantity of bridged taps, load coils and repeaters present on the loop
- Length of the feeder cable (F1) and the distribution cable (F2) respectively
- Existence of fiber in the loop
- Any disturbers currently present in the same and adjacent binder group.
- An indication as to whether the loop currently qualifies for the CLEC specified Power Spectral Density (PSD), based on the industry standards or draft standards, whichever are currently published
- Tracking number (which must be referenced if an order is placed)

After receiving the loop qualification information, the CLEC will decide whether to place an xDSL loop order. The loop make-up information returned to the CLEC is considered valid for 30 calendar days.

Ordering

Ordering is initiated by submitting an LSR with the necessary information for an xDSL-capable loop. This includes a tracking number when loop qualification has been performed in advance. The CLEC can submit the LSR via fax or paper mail.

When there is no tracking number on the request, the LECC will suspend processing until the loop qualification step is performed. The LECC will return a copy of the results to the CLEC.

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When the loop meets the specifications and/or the conditions on the LSR, the service order is issued and the FOC is returned to the CLEC. Conversely, if the loop did not meet the specifications and/or conditions specified by the CLEC, the LSR will be rejected. The CLEC then has the option of resubmitting the LSR with revised specifications and/or conditions.

F. PMO Comparison

The following charts show a comparison of the pre-qualification, loop qualification and ordering processes currently in the four regions.

PMO Pre-Qualification

Item/Function	Ameritech	SWBT	SNET	PB/NB
Pre-qualification optional?	N/A	Yes	N/A	Yes
Phone, Fax, Email	No	No	No	Yes
DataGate / Verigate	N/A	Yes	N/A	Yes
Data Returned	N/A	Green. Yellow, Red; 26-gauge equivalent loop length	N/A	RTZ = 12, 17, 18, Blank
Charge for pre-qualification	N/A	No	N/A	No
If result is 17, 18, or blank, perform loop qualification	N/A	No	N/A	Yes
If result is 12, can issue order without loop qualification per specifications of CLEC contract	N/A	No	N/A	Yes

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PMO Loop Qualification

Item/Function	Ameritech	SWBT	SNET	PB/NB
E-mail	Yes	No	No	Yes
Fax	No	Yes	Yes	Yes
Return qualification and detailed loop makeup	Illinois – Yes Other states by 1/6/2000	Yes	Yes	Yes
Return tracking number	No	Yes	Yes	No
Return transaction code	No	No	No	Yes
Qualification good for 30 days	No	Yes	Yes	Yes
Charge for qualification lookup	NRC for time spent per loop request	Charge per CLEC contract	Charge per CLEC contract	Charge per CLEC contract
Interval for returning qualification response	1 hour to 5 business days	3 to 5 business days	3 to 5 business days	5 minutes to 72 hours

PMO Ordering

Item/Function	Ameritech	SWBT	SNET	PB/NB
Manual LSR	No	Yes	Yes	Yes
BDS-Telis (EXACT)	Yes	N/A	N/A	N/A
EDI	Yes	Yes	No	Yes
LEX	N/A	Yes	N/A	Yes
CESAR - (ISR)	N/A	N/A	N/A	Yes
Look for Tracking /Transaction number on LSR	No	Yes	Yes	Yes
LSC initiates loop qualification when tracking/transaction number not on LSR	No	Yes	Yes	Yes
Reject LSR if loop	No	Yes	Yes	No

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Item/Function	Ameritech	SWBT	SNET	PB/NB
doesn't qualify				
If address doesn't qualify, recommend IDSL	No	No	No	Yes
FOC sent	Yes	Yes	Yes	Yes
Suspend order if conditioning required. Cancel in 5 days if no CLEC response	Yes	No	No	No

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I. FUTURE METHOD OF OPERATION (FMO) for SBC (All Regions)

A. Overview

The evaluation of the PMO across the thirteen states has given SBC the opportunity to identify where process changes are possible to enhance the business processes of each of the SBC regions. CLEC input and SBC's experience in the rapidly changing data business has provided insight in how to enhance the xDSL pre-ordering and ordering processes. This resulted in the development of an FMO based on the introduction of 13-state common business practices, even though this isn't a requirement of this specific merger condition.

SBC will continue to make pre-ordering functions available as discussed in the PMO. The FMO will focus on the loop qualification and ordering processes. The existing pre-qualification process will remain available in the regions where it exists. However, based on CLEC input that pre-qualification information is inadequate, it is not included in the FMO.

B. Loop Qualification

SBC will furnish CLECs with access to a mechanized loop qualification capability that can be used to qualify loops on a pre-order basis. This function will be available as part of EDI and DataGate pre-order functionality. This mechanized loop qualification will provide the CLECs with the information needed to make an informed business decision regarding its ability to provide DSL-based service to the end user.

The loop qualification/loop make-up response will return the following information to the CLEC for a loop to the specified end user premises:

- Loop length
- Loop length by segment
- Length by gauge
- 26 gauge equivalent loop length (calculated)
- Presence of load coils
- Quantity of load coils (if applicable)
- Presence of bridged taps
- Length of bridged taps (if applicable)
- Presence of pair gain/DLC
- Qualification status of the loop based on specified PSD. If no PSD class is specified, the default PSD is class 5 (ADSL).
- Tracking number (which must be referenced if an order is placed)

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- Source of data – actual or designed

A data source indicator will identify if the response contains information about an actual loop or information regarding the longest designed loop within the distribution area. Designed loop information will only be provided when actual loop make up information is not mechanically available for the specific requested address.

In addition, the following information will be returned when present in the “backend” systems. The information available in the “backend” systems may vary by region. If the following information is not available, these fields will be blank:

- Location of load coils
- Location of bridged tap
- Type of DLC
- Presence of DAML
- Presence of disturbers in same or adjacent binder groups
- Loop medium
- Whether the loop originates at a Remote Switching Unit (RSU)

In summary, the pre-ordering capabilities for xDSL will return all loop qualification information that is available electronically when requested via the Datagate or EDI electronic interfaces.

C. Ordering

All of SBC's regions currently use LSRs either sent mechanically through EDI or faxed to the Local Service Center for xDSL-capable loop orders. The LSR, which is the industry standard ordering form for local services, will continue to be the ordering mechanism for DSL-capable loops. However, six fields on the LSR are either used differently or may have different values on a regional basis. SBC will standardize the use of these six LSR fields specific to the ordering of xDSL-capable loops throughout its regions.

When a CLEC decides to request an xDSL-capable loop, the CLEC will submit an LSR to SBC via EDI. The LSR must include the requested PSD class, the loop qualification tracking number and any desired conditioning. The CLEC can specify the desired due date based upon set intervals for a non-conditioned or conditioned loop. The CLEC can also pre-authorize known and unanticipated conditioning charges.

Currently, there are some differences pertaining to the types and technical specifications of xDSL-capable loops offered. Rather than having standards based on technology, which are by their very nature limiting, the industry is currently moving toward spectrum management classes

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that are not based on specific technologies. SBC's regions will standardize its xDSL-capable loop product offerings based on the industry's proposed broad spectrum management classes. With the adoption of consistent xDSL-capable loop products, both CLECs and SBC will benefit from consistency and flexibility in the rapidly emerging data market. CLECs will be able to designate the spectrum class they are requesting through use of the NC, NCI and SECNCI code fields on the LSR. Values utilized in these LSR fields will be standardized across the 13 states.

Inconsistencies in the use of loop qualification tracking numbers or transaction codes will be eliminated through utilization of the Customer Number (CNO) field, which SBC will use as a tracking code field. The CLEC must place the tracking code returned on the loop qualification in this field to verify that pre-order loop qualification has been done. When this code is in place on the LSR, SBC will know the loop has been qualified, and if the qualification took place within the past 30 days the request is ready for order issuance. If xDSL loop ordering changes currently under discussion at the Ordering and Billing Forum (OBF) are adopted, changes designed specifically for loop qualification tracking will be implemented by SBC.

By utilizing the pre-order loop qualification capability, a CLEC will have information about the amount and type of conditioning that may be required to support its technology prior to issuing its loop request. A CLEC will utilize the Service or Product Enhancement Code (SPEC) field on the LSR to request the level of line conditioning it seeks. Occasionally, the assignment and provisioning process will identify additional conditioning that will positively impact the loop's performance. SBC will make it possible for a CLEC to pre-authorize this unanticipated conditioning. This will be accomplished by means of the SPEC value entered on the LSR. SBC will standardize the use of the SPEC field across all regions¹. This will eliminate interruptions to the provisioning process while waiting for authorization of additional conditioning. CLECs have expressed support for this option.

CLECs expressed the desire to have definite due date intervals. CLECs also want to be certain when they get a FOC, the due date is firm and not subject to change. SBC will implement standard intervals throughout all regions for conditioned and non-conditioned loops. Standardized due dates will enhance the CLECs' ability to negotiate firm due dates with their end users.

SBC's electronic ordering systems will validate the LSR including verifying that the loop is capable of supporting the requested PSD class using the tracking number supplied in the CNO field on the LSR. After all the order information has been validated, SBC will issue a service order and return a FOC to the CLEC.

After the SBC service order has been issued and the loop has been assigned, SBC will then provide loop make-up information for the actual assigned loop to the CLEC via a DLR or DLR-like document.

¹ As a result of this action, the Type Of Service (TOS) field will be mandatory to indicate whether a loop is being provisioned to a residence or a business.

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D. Timeline

Because xDSL technology deployment choices are so dependent on loop make-up information, CLECs have stated they need this information to correctly provision and maintain service to end users. SBC recognizes the importance of delivering this information to CLECs including access to a pre-order loop qualification function that will deliver information while their service representatives are negotiating service with their customers. This will promote faster turnaround times between initiation of a service request, and the receipt of qualification advice, loop information and order confirmation. SBC intends to furnish CLECs with the capability to perform xDSL loop qualification (or detailed loop make-up) in an enhancement to its DataGate (where currently deployed) and EDI pre-ordering interfaces.

In order to deliver this capability to the CLEC community in an expedited fashion, SBC will initially provide access to loop qualification information based on a designed model. This will first eliminate the manual step described in the PMOs and then the process will be enhanced to access actual loop data. This mechanized access to loop qualification information (based on the designed model) will initially be available, in the PB/NB and SWBT regions, via DataGate. The DataGate enhancement to support loop qualification is planned for March 18, 2000.

This same capability will also be made available via EDI. The EDI enhancement is planned for July 22, 2000. This EDI functionality will be made available in the existing EDI pre-ordering interfaces in the SWBT and PB/NB regions. Comparable changes will also be made in the SNET EDI interface. These changes are being introduced in SNET in the same timeframe even though the SBC/Ameritech Merger Conditions allow for the SNET changes to be implemented on a later timeline.

Use of loop information based on a designed model is not being utilized in Ameritech. The EDI pre-ordering interface within the Ameritech region will be enhanced to provide loop qualification based on actual loop data without making the interim change described for the other regions. This interface enhancement will be made available in the Ameritech region on April 3, 2000. The ability to use actual loop data, where available, in the other SBC regions is planned for December 2, 2000 via both DataGate (where currently deployed) and EDI interfaces.

Although the actual changes to the EDI ordering interfaces are not complex, the necessary internal business process changes SBC is committing to undertake are significant. These changes will take time to introduce within SBC in order to be ready to allow CLECs to benefit from the improved ordering process. Therefore the EDI ordering changes will be introduced in the Ameritech, PB/NB and SWBT regions no later than December 2, 2000. These same process changes will be made in SNET within the obligatory timeframe. However the exact date has yet to be determined. The Uniform Interfaces Plan of Record will identify the release date when these process changes will take effect in SNET.

Please refer to the following timeline for more detail.

OSS Plan of Record for Pre-Ordering and Ordering of xDSL and Other Advanced Services

SBC FMO Timeline -- Release Schedule

Milestones	Availability Date
<u>Loop Qualification</u>	
<i>Access to the loop qualification information based on a designed model</i>	
DataGate (SWBT/PB/NB)	
• Initial Specifications Accessible Letter	12/17/1999
• Final Specifications Accessible Letter	1/14/2000
• CLEC Testing Start Date	2/9/2000
• Implementation	3/18/2000
EDI (SWBT/PB/NB/SNET)	
• Initial Specifications Accessible Letter	2/21/2000
• Final Specifications Accessible Letter	4/3/2000
• CLEC Testing Start Date	6/15/2000
• Implementation	7/22/2000
<u>Loop Qualification</u>	
<i>Access to actual loop qualification information where mechanized data is available. Loop qualification information based on a designed model will be supplied where actual loop qualification information is not available</i>	
EDI (Ameritech)	
• Pre-Notification of Change	12/16/1999
• Final Specifications available via TCNET	1/14/2000
• Implementation	4/3/2000
DataGate (SWBT/PB/NB)	
• Initial Specifications Accessible Letter	6/30/2000
• Final Specifications Accessible Letter	8/14/2000
• CLEC Testing Start Date	10/26/2000
• Implementation	12/2/2000
EDI (SWBT/PB/NB/SNET)	
• Initial Specifications Accessible Letter	6/30/2000
• Final Specifications Accessible Letter	8/14/2000
• CLEC Testing Start Date	10/26/2000
• Implementation	12/2/2000
<u>Ordering</u>	
EDI (Ameritech)	
• Final Specifications available via TCNET	9/1/2000
• Implementation	12/2/2000
EDI (SWB/PB/NB)	
• Initial Specifications Accessible Letter	6/30/2000
• Final Specifications Accessible Letter	8/14/2000
• CLEC Testing Start Date	10/26/2000
• Implementation	12/2/2000

December 7, 1999

Regional Comparison of Qualification Data Elements

<u>Qualification Data Elements</u>	<u>SWBT</u>	<u>PB/NB</u>	<u>Ameritech</u>	<u>SNET</u>
Actual loop length	Manual Record Look-up by Engineer (20% available in mechanized database)	Manual Record Look-up by Engineer (30% available in mechanized database)	Manual Record Look-up by Engineer (80% available in mechanized database)	Manual Record Look-up by Engineer (20% available in mechanized database)
Designed loop length	Manual Record Look-up by Engineer (100% available in mechanized database)	Manual Record Look-up by Engineer (30% available in mechanized database)	Not available	Manual Record Look-up by Engineer (100% available in mechanized database)
Length by gauge (Actual)	Manual Record Look-up by Engineer (20% available in mechanized database)	Manual Record Look-up by Engineer (30% available in mechanized database)	Manual Record Look-up by Engineer (80% available in mechanized database)	Manual Record Look-up by Engineer (20% available in mechanized database)
Length by gauge (Designed)	Manual Record Look-up by Engineer (100% available in mechanized database)	Manual Record Look-up by Engineer (30% available in mechanized database)	Not available	Manual Record Look-up by Engineer (No mechanized data available)
26 gauge equivalent of actual loop length	Calculated	Calculated	Formula supplied	Calculated
26 gauge equivalent designed loop length	Calculated	Calculated	Not available	Calculated
Presence of:				

Regional Comparison of Qualification Data Elements

repeaters	Data available only where a working loops require use of Repeaters. Manual lookup required.	Data available only where a working loops require use of Repeaters. Manual lookup required.	Data available only where a working loops require use of Repeaters. Manual lookup required.	Data available only where a working loops require use of Repeaters. Manual lookup required.
load coils	Manual Record Look-up by Engineer (20% available in mechanized database)	Manual Record Look-up by Engineer (30% available in mechanized database)	Manual Record Look-up by Engineer (80% available in mechanized database)	Manual Record Look-up by Engineer (20% available in mechanized database)
bridged tap	Manual Record Look-up by Engineer (20% available in mechanized database)	Manual Record Look-up by Engineer (5% available in mechanized database)	Manual Record Look-up by Engineer (80% available in mechanized database)	Manual Record Look-up by Engineer (20% available in mechanized database)
Location of:				
repeaters	Data available only where a working loops require use of Repeaters. Manual lookup required.	Data available only where a working loops require use of Repeaters. Manual lookup required.	Data available only where a working loops require use of Repeaters. Manual lookup required.	Data available only where a working loops require use of Repeaters. Manual lookup required.
load coils	Manual Record Look-up by Engineer (No mechanized data available)	Manual Record Look-up by Engineer (No mechanized data available)	Manual Record Look-up by Engineer (80% available in mechanized database)	Manual Record Look-up by Engineer (No mechanized data available)
bridged tap	Manual Record Look-up by Engineer (No mechanized data available)	Manual Record Look-up by Engineer (No mechanized data available)	Manual Record Look-up by Engineer (80% available in mechanized database)	Manual Record Look-up by Engineer (No mechanized data available)

December 7, 1999

RC Attachment D-21

Regional Comparison of Qualification Data Elements

Number of:				
repeaters	Manual Record Look-up by Engineer (No mechanized data available)	Manual Record Look-up by Engineer (No mechanized data available)	Manual Record Look-up by Engineer (No mechanized data available)	Manual Record Look-up by Engineer (No mechanized data available)
load coils	Manual Record Look-up by Engineer (20% available in mechanized database)	Manual Record Look-up by Engineer (30% available in mechanized database)	Manual Record Look-up by Engineer (80% available in mechanized database)	Manual Record Look-up by Engineer (20% available in mechanized database)
bridged tap	Manual Record Look-up by Engineer (20% available in mechanized database)	Manual Record Look-up by Engineer (5% available in mechanized database)	Manual Record Look-up by Engineer (80% available in mechanized database)	Manual Record Look-up by Engineer (20% available in mechanized database)
Presence of:				
pair gain/DLC	Manual Record Look-up by Engineer (90% available in mechanized database)	Manual Record Look-up by Engineer (90% available in mechanized database)	Manual Record Look-up by Engineer (80% available in mechanized database)	100% available in mechanized database based on designed data.
DAML	Manual Record Look-up by Engineer (100% available in mechanized database)	Manual Record Look-up by Engineer (50% available in mechanized database)	Manual Record Look-up by Engineer (80% available in mechanized database)	Manual Record Look-up by Engineer (No mechanized data available)

Regional Comparison of Qualification Data Elements

Disturbers in same or adjacent binder groups	Manual Record Look-up by Engineer (100% available in mechanized database)	Manual Record Look-up by Engineer (90% available in mechanized database)	Not currently available. Pending 706 outcome.	Manual Record Look-up by Engineer (100% available in mechanized database)
Type of DLC	Manual Record Look-up by Engineer (100% available in mechanized database)	Manual Record Look-up by Engineer (90% available in mechanized database)	Manual Record Look-up by Engineer (80% available in mechanized database)	Manual Record Look-up by Engineer (100% available in mechanized database)
Loop Medium (Serving Technology Type)	Only for Presence of DLC; Manual Record Look-up by Engineer (100% available in mechanized database)	Only for Presence of DLC; Manual Record Look-up by Engineer (90% available in mechanized database)	Only for Presence of DLC; Manual Record Look-up by Engineer (80% available in mechanized database).	Copper by default under 18Kft. Manual Record Look-up by Engineer (100% available in mechanized database) for over 18Kft.
Does LOOP originate at remote switching unit. (RSU)	Manual Record Look-up by Engineer (100% available in mechanized database)	Manual Record Look-up by Engineer (100% available in mechanized database)	Manual Record Look-up by Engineer (80% available in mechanized database)	Manual Record Look-up by Engineer (100% available in mechanized database)

NOTE: Percentages are approximated by region.

OSS Plan of Record for Pre-Ordering and Ordering of xDSL and Other Advanced Services Glossary of Terms

The following lists common terms and their definitions as used throughout this document:

Ameritech

The five-state operating region of SBC, which encompasses the states of Illinois, Indiana, Michigan, Ohio and Wisconsin.

Binder Group

A subset of cable pairs bound together within a larger single cable.

Conditioning

The activity required to remove certain interferers (such as load coils, bridged tap or repeaters) from a loop in order to allow data signal transmission at the highest possible level.

Customers' Enhanced System for Access Requests (CESAR)

An SBC proprietary graphic user interface (GUI) utilized for the mechanized exchange of ordering information.

DataGate

An SBC proprietary application-to-application interface utilized for the mechanized exchange of pre-ordering information.

Designed Loop

Loop information based on design of a typical loop serving a distribution area. Designed loop qualifications return general loop characteristics for a specific locale or serving area, not specific characteristics of an individual loop.

Digital Loop Carrier (DLC)

The multiplexing of individual voice grade channels onto a copper cable pair or fiber transmission medium (as opposed to the use of a single copper cable pair per channel).

Electronic Data Interchange (EDI)

An industry-standard application-to-application interface protocol utilized for the mechanized exchange of pre-ordering and ordering information.

Load Coils, Bridged Tap, Repeaters

Elements placed in the network to provide certain characteristics and functionalities. These elements may interfere with data transmission of DSL technologies, thus they are often referred to as interfering or disturbing equipment.

**OSS Plan of Record for Pre-Ordering and Ordering of
xDSL and Other Advanced Services
Glossary of Terms**

Local Service Request (LSR)

The industry standard format developed under the auspices of Ordering and Billing Forum (OBF) for the ordering of local service Resale, Number Portability, individual Unbundled Network Element (UNE) Loops and Ports and UNE Loops and Ports in combination.

Local Service Request Exchange (LEX)

An SBC proprietary graphic user interface (GUI) utilized for the mechanized exchange of ordering information based on LSR industry guidelines.

Pacific Bell / Nevada Bell (PB/NB)

The two-state operating region of SBC, which encompasses the states of California and Nevada.

Power-Spectrum Density (PSD) Classes

Broad classes of spectrum attributes that correspond to different types of DSL technology. Rather than defining parameters for each current DSL technology, plus all future offerings, PSD classes speak to speed of data transmission and whether data is transmitted in a synchronous or asynchronous manner. One PSD Class may support many types of DSL technology.

SBC Communications (SBC)

The corporate entity which encompasses SWBT, PB/NB, Ameritech and SNET.

Southern New England Telephone (SNET)

The SBC operating region, which includes the state of Connecticut.

Southwestern Bell Telephone (SWBT)

The five-state operating region of SBC, which encompasses the states of Missouri, Oklahoma, Kansas, Arkansas and Texas.

Verigate

An SBC proprietary graphic user interface (GUI) utilized for the mechanized exchange of pre-ordering information.